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UNITED STATES BANKRUPTCY COURT
 FOR THE EASTERN DISTRICT OF CALIFORNIA
 SACRAMENTO DIVISION

In re:)	Case No.	21-20600-C-11
)	DCN:	RLC-02
)	Date:	
Victoria Gewalt,)	Time:	
)	Dept:	C
Debtor.)	Courtroom:	35
)	Judge:	Klein
)		

**DEBTOR'S EX PARTE APPLICATION FOR ORDER SHORTENING TIME
 FOR HEARING ON MOTION TO SELL REAL PROPERTY**

Debtor Victoria Gewalt (Debtor) through her attorney Stephen M. Reynolds, hereby requests that the Court shorten time to allow the hearing of Debtor's Motion to Sell Real Property (RLC-3) on shortened time. Normally 35 days' notice is required. Debtors is requesting that time be shortened to allow the sale motion to be heard on March 24, 2021 at 11:00 a.m. with service to all creditors no later than March 5, 2021 or 19 days' notice. Federal Rule of Bankruptcy Procedure 9006(c) (1) provides that the Court, for cause shown may reduce the time required for a hearing. Eastern District Local Rule 9014(f) (3) similarly provides for hearings on less than fourteen days' notice.

In support of their request, Debtor states as follows:

1. Debtor filed a petition under Chapter 11 Subchapter V on February 22, 2021.

1 2. Debtor remains as Debtor-in-Possession and will be proposing a liquidating
2 Plan of Reorganization that will pay all creditors in full with the sale of California and Texas
3 rental properties.

4 3. It is imperative that the sale proceed on March 24, 2021. Debtor is an experienced real
5 estate investor and developer with thirty years' experience in the field. The property was listed
6 for sale prior to the bankruptcy filing and three offers have been obtained. The property is the
7 subject of a ski season rental and will stop generating rent at the end of April, 2021. The
8 property is subject to two deeds of trust and a prompt sale and closing will minimize interest
9 expense to the benefit of the debtor, the estate and the creditors of the estate

10 **WHEREFORE**, Debtor requests that this Court allow for the hearing on Debtor's
11 Motion to Sell Real Property on March 24, 2021 with mailing or other service to all parties to
12 be completed no later than March 5, 2024, opposition if any to be filed by March 19, 2021, and
13 for such further relief as the court deems proper.

14 Dated: March 3, 2021

Reynolds Law Corporation

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16 /s/ Stephen M. Reynolds
17 Stephen M. Reynolds
18 Attorney for Victoria Gewalt
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